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Food and Drug Administration  
Office of Special Nutritionals (HFS-450)  
Center of Food Safety and Applied Nutrition  
200 C Street, SW  
Washington, DC 20204

10/19/98

Dear Sirs:

Notice is hereby given pursuant to the requirements of Section 403(r) (6) (21 U.S.C. 343 (r) (6) ) of the Federal Food, Drug, and Cosmetic Act and in accordance with the requirements of 21 C.F.R. 101.93, that M.D. Labs, P.O. Box 27776, Tempe, AZ 85282, within the past 30 days commenced marketing a dietary supplement bearing the following statement(s) on the label and/or in the labeling:

**TEXT OF CLAIM**

CM 5000 uses pure pharmaceutical grade Creatine Monohydrate. Creatine is a small, nitrogen containing molecule that serves as a storage form of energy in cells. About 95% of the body's Creatine pools are found in muscle tissue. Within the muscle, Creatine is found in two forms; Creatine Phosphate and free Creatine. Orally ingested Creatine is converted to Creatine Phosphate within the muscle. Depletion of existing Creatine Phosphate results in weakened muscular contractions. CM 5000 is designed to replenish and build Creatine levels within the body.

**NAME OF INGREDIENT OR SUPPLEMENT THAT IS SUBJECT OF CLAIM**

Creatine Monohydrate

**NAME OF SUPPLEMENT (INCLUDING BRAND NAME)**

Human Development Technologies - CM 5000

The undersigned certifies that the information contained in this notice is complete and accurate and that M.D. Labs has substantiation that the statement is truthful and not misleading.

Sincerely,  
M.D. Labs

Chris La Fleur  
Director of Marketing

97S-0162

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